REMARKS

This amendment is responsive to the non-final Office Action of June 20, 2010. Reconsideration and allowance of **claims 3, 6, 8-11, 13-26** are requested.

The Office Action

Claim 3-4, 6-11, 13-14, 16-19, and 21-23 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Lowell et al. (US 6,292,68) in view of Russell (US 6,493,581).

Claim 20 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Lowell et al. in view of Russell and further in view of Pike (US 6,459,371).

Claim 24 does not stand rejected and is understood to contain allowable subject matter.

The Claims Distinguish Patentably Over the References of Record

Claims 3-4, 6-11, 13-14, 16-19, and 21-23 are patentable over Lowell et al. as modified by Russell. These rejections are hereby traversed.

Regarding **claim 24**, neither Lowell et al., nor Russell, nor the combination teach or fairly suggest a detector configured to activate the navigation unit in response to detecting an interaction between the emergency responder and the emergency response device and wherein the routing of the emergency responder to the victim based on the position information of the victim and position information of the emergency response device is not determined until an interaction between the emergency responder and the emergency response device is detected. The Examiner acknowledged in the Office Action of July 7, 2009 (pg 3; lines 14-16) that Lowell does not teach activating a navigation unit in response to detecting an action of the emergency responder on the emergency response device. The Applicant agrees that Lowell does not disclose this limitation. The Examiner does not allege that Russell cures this shortcoming. Indeed, Russell does not. Rather, Russell discloses a system including a locator to determine locations of the defibrillators, a victim, and/or a potential operator of the defibrillators and a communicator to communicate the location of at least one of the defibrillators to the potential operator.

The present application addresses the problem that considerable power is consumed when the emergency response device communicates with a positioning system which shortens battery life of the remote emergency response device. Power remaining (battery life and energy for defibrillation) is saved by providing the routing and position information only when the information is needed by the emergency responder or when the emergency responder is present at the remote emergency response device. It is respectfully submitted that neither Lowell et al., nor Russell, nor the combination address the problem addressed by the present application. Neither does Lowell, Russell, nor the combination teach the solution of activating the navigation unit in response to an interaction between the responder and the emergency device.

Accordingly it is submitted that **claim 24** and **claims 6-10 and 18-20** which depend therefrom distinguish patentably from the references of record.

Claim 11 continues to call for activating a navigation unit of the emergency response device in response to detecting an interaction between the emergency responder and the emergency response device. The Examiner does not allege (and correctly so) that Lowell et al., Russell, or the combination teach or fairly suggest a method of summoning and routing an emergency responder which includes the step of activating the navigation means upon detection of an interaction between the emergency responder and the emergency response device.

Accordingly it is submitted that **claim 11** and dependent **claims 13, 20, and 21** distinguish patentably from the references of record.

Claim 14 calls for a navigation unit which in response to detecting an interaction of the emergency responder with the emergency response device determines a route for the emergency responder between the emergency response device and the victim based on the victim position information and the emergency response device position. Neither Lowell et al., nor Russell, nor the combination teach or fairly suggest the navigation unit being activated in response to detecting an action of the emergency responder on the emergency response device.

Accordingly it is submitted that **claim 14** and **claims 3, 15-17, and 23** which depend therefrom distinguish patentably from the references of record.

Claim 18 calls for the navigation unit to store a floor plan of at least a portion of a building in which the emergency response device is located and the user interface to display at least a portion of the floor plan as part of the routing fed back to the emergency responder. Neither Lowell et al., nor Russell, nor the combination teach or fairly suggest a navigation unit of an AED storing a floor plan of at least a portion of the building in which it is located and display at least a portion of the floor plan that is provided in the routing information fed back to the emergency responder. Rather Lowell (Col. 8; lines 2-12) teaches using a PowerNow system by Alpine which displays a road map and audibly tells the driver when to turn the vehicle. This might bring a responder to an office building, airport, shopping mall, park, or other public place but would not help the responder navigate the public place to find the victim.

New **claim 25** adds the allowable subject matter of claim 24 to independent claim 11.

New **claim 26** adds the allowable subject matter of claim 24 to independent claim 14.

CONCLUSION

For the reasons set forth above, it is submitted that all claims are not anticipated by and distinguish patentably and unobviously over the references of record. An early allowance of all claims is requested.

Respectfully submitted,

FAY SHARPE LLP

Thomas E. Kocovsky, Jr.
Reg. No. 28,383
The Halle Building, 5th Floor
1228 Euclid Avenue
Cleveland, OH 44115-1843
216.363.9000

Direct All Correspondence to:
Yan Glickberg, Reg. No. 51,742
US PHILIPS CORPORATION
P.O. Box 3001
Briarcliff Manor, NY 10510-8001
(440) 483-3455 (tel)
(440) 483-2452 (fax)